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September 20, 2019

**VIA ECF AND HAND DELIVERY**

The Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

Re: *In re Application of Hornbeam Corporation*, Case No. 1:14-mc-00424-P1

Dear Judge Broderick:

On behalf of Applicant Hornbeam Corporation (“Hornbeam”), we write in connection with the Court’s Order, dated September 13, 2019 (Doc. 170), and pursuant to Rule 5(B) of Your Honor’s Individual Rules & Practices in Civil cases, to respectfully request that certain portions of the Declarations that we are submitting contemporaneously with this letter be filed in redacted form. The redactions are necessary to protect confidential and sensitive information, including our firm’s sensitive communications and the names of the individuals who received Responsive Materials and signed Certifications pursuant to the Second Amended Protective Order (the “SAPO”). (Doc. 106).<sup>1</sup> The SAPO contemplates that the Certifications shall be afforded confidential treatment by providing that they will not be provided to the non-disclosing party unless that party “make[s] an application to have the Certifications produced for good cause.” (Doc. 106 §6(f)).

Pursuant to Rule 5(B) of Your Honor’s Individual Rules & Practices in Civil cases, we are delivering this letter via hand delivery and enclosing versions of our Declarations that highlight the relevant portions to be redacted. We are submitting digital copies of this letter and the highlighted Declarations via email as well. We are available at the Court’s convenience if the Court would like to discuss this letter, the Declarations, or any of the proposed redactions.

Respectfully submitted,



/s/ Michael V. Rella

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<sup>1</sup> “Responsive Materials” refers to those materials defined in § 1(i) of the SAPO. (See Doc. 106). “Certification” refers to Certifications as they are defined throughout the SAPO. (See *id.*)